

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF MONROE

The Red Right Hand Rifle Syndicate LLC

Plaintiff,

Index No. 22 CV 6505
/20

- against -

Kyle Arthur Sopko
Outreach Director
Upstate New York Chapter
The Socialist Rifle Association (501c4)

Defendant.

COMPLAINT



TO THE SUPREME COURT OF THE STATE OF NEW YORK

The complaint of the plaintiff, Red Right Hand Rifle Syndicate LLC, respectfully shows and alleges as follows:

- 1) The Plaintiff herein, the Red Right Hand Rifle Syndicate, an LLC formed under NYS law which acquired both a FFL08 Import/Export license and an AECA registration, has a current mailing address at 424 E Main Street #3R Palmyra NY 14522.
- 2) The defendant herein, Kyle Sopko, has a last known address at 790 Exchange St, Rochester New York, 14608. Sopko is the Outreach Director of the Upstate New York Chapter of the Socialist Rifle Association (a 501c4 nonprofit corporation based in Kansas).
- 3) Matthew Mooney is Legal Director of the Socialist Rifle Association, with a mailing address of 4601 East Douglas Ave, Wichita KS 67218.
- 4) On July 30th, the LLC became aware defendant Sopko utilized the SRA's social media platform to spread libel with direct and stated malicious intent to cause harm and defame the LLC and its ownership, causing immense reputational, economic and emotional damage.

Sopko and UNYSRA's defamations include:

- 5) Sopko, under their alias "Comrade Bylat," levies blatantly false allegations of the LLC's illegal sale of firearms without a license
- 6) Blatantly false allegations of illegal NY sale of high capacity magazines in violation of SAFE act
- 7) Blatantly false allegations of "a broad pattern of abuse and violence" by LLC ownership, calling them "ongoing threat to the community."
- 8) Blatantly false allegations LLC ownership was in an "ongoing court case directly related to [ex's girlfriend Molly Rose's false abuse allegations] which prevented some of those interviewed [by SRA's internal kangaroo court] from speaking until it concluded."
- 9) Blatantly false allegations that ownership in question is a "serial domestic abuser"
- 10) Blatantly false accusations that ownership in question is a "sexual predator with multiple victims"
- 11) Sopko admits publicly that the UNY SRA goal is to damage the reputation and economic ability of the LLC

- 12) UNY encouraged customers to get credit card refunds to damage the LLC, which now has a bill for 20K in chargebacks.
- 13) Sopko publicly admits to stalking behavior and personal hobby "investigations" into Keenan in preparation for their libelous doxing of Keenan's name, which was kept private for the family's safety based on the nature of the industry.
- 14) Sopko claimed in their defamatory campaign to have access to the LLC's digital accounts; this claim was proven true by documented instances of felony cybercrime committed by Sopko, who has been logged and documented inside our computer systems deleting information back to October 2021 on at least two occasions (October 20th and November 9th 2022), causing extensive data loss and security risk.
- 15) By reason of the facts and circumstances stated above, the defendant has maliciously committed Defamation Per Se, exposing the LLC and its workforce to aversion, contempt, hatred, and induction of an unsavory or evil opinion in the minds of a significant number of people in the community, causing special harm.
- 16) By reason of the facts and circumstances stated above, Sopko and UNY Leadership have engaged in a defamatory and criminal campaign to interfere with and cause economic harm to the LLC, a duly licensed interstate trafficker, in violation of § 1951 8.143B (HOBBS Act), inviting a federal Racketeer Influenced and Corrupt Organizations investigation for criminal liability beyond this civil motion.
- 17) By reason of the facts and circumstances stated above, through §20.05 Criminal liability for conduct of another, no defense and §20.20 Criminal liability of corporations, the Socialist Rifle Association at large is responsible for the behavior of its High Managerial Agents within its Upstate New York Chapter.
- 18) By reason of the fact the Socialist Rifle Association Chapters are arranged without state incorporation to make litigation against its agents difficult as the 501c4 is headquartered in Kansas, a request for Diversity has been applied to this case to bring the SRA to court directly.
- 19) Even when Ordered by a Judge to make a rightful public retraction, the damage done by Outreach Director Sopko and UNYSRA leadership's malicious defamation per se is permanent and both socially and economically haunting.
- 20) On UNY's defamation campaign on Reddit, the UNYSRA Treasurer admits that they have no evidence to support their claims, are not a court, and do not adhere to a "beyond a reasonable doubt" standard.
- 21) Sopko's intensity of hate-inspiring accusations to a specifically gun-owning audience is more than defamation per se, but a call to arms to armed radicals: Keenan's personal information and photos now appear on white nationalist site AntifaWatch, featuring UNYSRA's defaming social media posts as their "evidence" (far right-wing reaching proof of reputational damage).

Plaintiff: The Red Right Hand Rifle Syndicate LLC

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680-766-0320

22) By reason of the facts and circumstances stated above, the plaintiff has been damaged by the defendant in the sum of \$50,000,000.00.

WHEREFORE, plaintiff demands judgment against defendant in the sum of \$50,000,000.00, plus an annual 2.5% interest from

July 4th, 2023, with costs and disbursements, together with any other relief specified by the Court to affect timely restitution.

23) In addition to damages, the LLC requests Order of Protections against Sopko for its workforce, against two of whom Sopko has previously and repeatedly made unwanted and rebuked sexual advances (a potential motive for his crimes).

24) In addition to the Protection Order, Sopko's 5+ rifles need to be confiscated for the LLC staff's continued safety during proceedings as

he knows where we live and has a clear history of irrational behaviors and publicly encouraging violence, is obviously unstable and unable to deal with rejection, and has delusions of grandeur- believing himself to be both extrajudicial Judge, Jury and Social executioner as they claim the US court system is broken. It is the LLC's experience that if you don't break the law, the courts will work in your favor.

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Dated: 11/14/2022

RED RIGHT HAND RS LLC
Plaintiff

VERIFICATION

Keenan Fisher, being duly sworn, deposes and says:

I am the plaintiff in the above-entitled action. I have read the foregoing complaint and know the contents thereof. The same are true to my knowledge, except as to matters therein stated to be alleged on information and belief and as to those matters I believe them to be true.


Signature

Keenan Fisher
Print Name

Sworn to before me this
14 day of November, 2022


Notary Public

